Case 9:22-cv-80916-RLR Document 1 Entered on FLSD Docket 06/22/2022 Page 1 of 7

JS 44 (Rev. 10/20) FLSD Revised 02/12/2021

FOR OFFICE USE ONLY: RECEIPT #

AMOUNT

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS	INCOLUNIS ON NEXT I NOD (, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	DEFENDANT	'S				
Mohammed	Amneal Pharmaceuticals, et al.							
(b) County of Residence o	f First Listed Plaintiff		County of Residence of First Listed Defendant Somerset (IN U.S. PLAINTIFF CASES ONLY)					
,	KCEPT IN U.S. PLAINTIFF CAS	SES)	NOTE:	IN LAND CO	NDEMNATION CA	ASES, USE THE	LOCATI(ON OF
Philadelp			Attorneys (If Know	THE TRACT	OF LAND INVOLV	VED.		
(c) Attorneys (Firm Name, A			* '*	n)				
Hamburg, Rubi 375 Morris Ro	rett, Esquire in, Mullin, Max oad, Lansdale,	well & Lupin PA 19446 215-	P.C. 661-0400		_	_	*	
(d) Check County Where Action	on Arose: MIAMI-DADE	☐ MONROE ☐ BROWARD ■	PALM BEACH MARTIN ST. L	LUCIE INDIAN F	RIVER OKEECHOB	EE HIGHLAND	3	_
II. BASIS OF JURISDI	CTION (Place an "X" ir	One Box Only)	I. CITIZENSHIP OF		L PARTIES (F	Place an "X" in Oi and One Box fo		
U.S. Government	□3 Fede	eral Question	(For Diversity Cases Only	PTF DEF			PTF	DEF
Plaintiff	(U.S. Government)	Not a Party)	Citizen of This State	_11	Incorporated or Pri of Business In This		□ 4	□ 4
☐ 2 U,S, Government Defendant		ersity ip of Parties in Item III)	Citizen of Another State	2 2				5
			Citizen or Subject of a Foreign Country		Foreign Nation		□ 6	□ 6
IV. NATURE OF SUIT		ly) RTS	Click here for: Nature of Suit Cod FORFEITURE/PENALTY		KRUPTCY	OTHER	STATUI	TES
110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (Excl. Veterans) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle 355 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury- Med, Malpractice	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Carc/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability	G25 Drug Related Seizure of Property 21 USC 88 G90 Other LABOR 710 Fair Labor Standards Act 720 Labor/Mgmt. Relations 740 Railway Labor Act 751 Family and Medical Leave Act 790 Other Labor Litigation 791 Empl. Ret. Inc.	423 With 28 U PROPE 820 Copy 830 Pater New D 840 Trad 880 Defe Act of 2 SOCIA 861 HIA 862 Black	RETY RIGHTS rrights at Abbreviated rrug Application cmark of Trade Secrets 2016 L SECURITY (1395ff) k Lung (923) C/DIWW (405(g)) Title XVI	375 False C 376 Qui Ta 3729 (a)) 400 State R 410 Antitru 430 Banks 450 Comm 460 Deport 470 Racke Corrupt Or 480 Consur (15 USC 485 Teleph Protection 490 Cable/ 850 Securit Exchange 890 Other 891 Agricu 893 Enviro 895 Freedd	m (31 USe teapportion ist and Banki cree attion teer Influganization teer Influganization Const. Act TV ties/Comm. Statutory / ultural Acts inmental M.	C niment ing innered and is to 692) inner A) indities/ Actions is Matters
REAL PROPERTY 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	CIVIL RIGHTS 440 Other Civil Rights 441 Voting 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 448 Education	PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vacal Sentence 530 General 535 Death Penalty 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee Conditions of Confinement	Security Act IMMIGRATION 462 Naturalization Applicat 465 Other Immigration Actions	□ 870 Taxe or D □ 871 IRS- □ 7609	AL TAX SUITS s (U.S. Plaintiff lefendant) —Third Party 26 USO	Act 896 Arbitra 899 Admir Act/Revic Agency De 950 Const Statutes	nistrative P w or Appo cision	cal of
□ 1 Original □ 2 Remo	State - (See VI -		erred from	Dist	eal to 8 rict Judge i Magistrate ment	Multidistrict Litigation – Direct File	Remand Appella	ded from ite Court
VI. RELATED/	, , ,	Re-filed Case TYES	_ /	Cases TYES	S 🗆 NO CKET NUMBER	9:20-md-0	2924-R	LR
RE-FILED CASE(S) VII. CAUSE OF ACTI	Cite the U.S. Civil St. ON 28 USC § 1	332	filing and Write a Brief Stater	ment of Cause (
VIII. REQUESTED IN COMPLAINT:	LENGTH OF TRIAL CHECK IF THIS UNDER F.R.C.P	IS A CLASS ACTION	(for both sides to try entire ca	C	CHECK YES only	if demanded in	complai	nt:
ABOVE INFORMATION IS DATE 6/22/22	TRUE & CORRECT TO	THE BEST OF MY KNO SIGNATURE OF A	OWLEDGE ATTORNEY OF RECORD	1 j				

JUDGE

IFP

MAG JUDGE

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

IN RE: ZANTAC (RANITIDINE)
PRODUCTS LIABILITY
LITIGATION

MDL NO 2924 20-MD-2924

JUDGE ROBIN L ROSENBERG MAGISTRATE JUDGE BRUCE REINHART

THIS DOCUMENT RELATES TO: MOHAMMED MEKUNS	JURY TRIAL DEMANDED
(Plaintiff Name(s))	

SHORT-FORM COMPLAINT

The Plaintiff(s) named below, by counsel, file(s) this Short Form Complaint against Defendants named below. Plaintiff(s) incorporate(s) by reference the allegations contained in the Master Personal Injury Complaint ("MPIC") in *In re: Zantac (Ranitidine) Products Lability Litigation*, MDL No. 2924 (S.D. Fla). Plaintiff(s) file(s) this Short-Form Complaint as permitted by Pretrial Order No. 31.

Plaintiff(s) select(s) and indicate(s) by completing where requested, the Parties and Causes of Actions specific to this case. Where certain claims require additional pleading or case specific facts and individual information, Plaintiff(s) shall add and include them herein.

Plaintiff(s), by counsel, allege as follows:

I. PARTIES, JURISDICTION, AND VENUE

A. PLAINTIFF(S)

1.	Plaintiff(s) Mohammed Mekuns ("Plaintiff(s)") brings this action (check the applicable designation):
	☑ On behalf of himself;
	In representative capacity as the, on behalf of the injured party, (Injured Party's Name)
2.	Injured Party is currently a resident and citizen of (City, State) Philadelphia County, Pennsylvania and claims damages as set forth below

—OR—

Decedent died on (Month,	Day,	Year)	At the time of
Decedent's death, Decedent	was a r	esident	and citizen of (City, State)

B. DEFENDANT(S)

- 4. Plaintiff(s) name(s) the following Defendants from the Master Personal Injury Complaint in this action:
 - a. Brand Manufacturers: Boehrninger Ingelheim; GlaxoSmithKline; Pfizer; Sanofi
 - b. Generic Manufacturers:

Ajanta Pharma USA Inc.; Amneal Pharmaceuticals of New York LLC; Aotex Corp; APPCO Pharma LLC; Aurbindo Pharma Ltd; Dr. Reddy's Laboratories; Glenmark Pharmaceuticals Ltd; Glenmark Pharmaceuticals Inc., USA; L. Perrigo Company; Novitium Pharma LLC; Par Pharmaceutical Inc.; Sandoz, Inc.; Strides Pharma Inc. (Strides Pharma Global Pte. Ltd); Sun Pharmaceutical Industries, Inc.; Teva Pharmaceuticals USA, Inc.; Wockhardt Ltd.

- c. Distributors: Granules USA Inc.
- d. Retailers: CVS

- . . .

- e. Repackagers:
 Denton Pharma Inc. d/b/a Northwind Pharmaceuticals; Golden State
 Medical Supply Inc.; L. Perrigo Company; Par Pharmaceutical Inc.
- f. Others Not Named in the MPIC:

C. JURISDICTION AND VENUE

- Identify the Federal District Court in which Plaintiff(s) would have filed this action in the absence of Pretrial Order No. 11 (direct filing) [or, if applicable, the District Court to which their original action was removed]: **Eastern District of Pennsylvania.**
- 6. Jurisdiction is proper upon diversity of citizenship.

II. PRODUCT USE

- 7. The Injured Party used Zantac and/or generic ranitidine: [Check all that apply]
 - ☑ By prescription
 - ☑ Over the counter
- 8. The Injured Party used Zantac and/or generic ranitidine from approximately (month, year) 2004 to 2019.

III. PHYSICAL INJURY

9. As a result of the Injured Party's use of the medications specified above, [he/she] was diagnosed with the following specific type of cancer (check all that apply):

Check all that	Cancer Type	Approximate Diagnosis	Date	of
apply				_
	BLADDER CANCER	September 2020		
	BRAIN CANCER			
	BREAST CANCER			
	COLORECTAL CANCER			
	ESOPHAGEAL/THROAT/NASAL CANCER			
	INTESTINAL CANCER			
	KIDNEY CANCER			
	LIVER CANCER			
	LUNG CANCER			
	OVARIAN CANCER			
	PANCREATIC CANCER			
	PROSTATE CANCER			
	STOMACH CANCER			

	TESTICULAR CANCER	
	THYROID CANCER	
	UTERINE CANCER	
	OTHER CANCER:	
	DEATH (CAUSED BY CANCER)	

10. Defendants, by their actions or inactions, proximately caused the injuries to Plaintiff(s).

IV. CAUSES OF ACTION ASSERTED

11. The following Causes of Action asserted in the Master Personal Injury Complaint are asserted against the specified defendants in each class of Defendants enumerated therein, and the allegations with regard thereto are adopted in this Short Form Complaint by reference.

Check if Applicable	COUNT	Cause of Action
V	I	STRICT PRODUCTS LIABILITY – FAILURE TO WARN
Ø	II	STRICT PRODUCTS LIABILITY – DESIGN DEFECT
V	III	STRICT PRODUCTS LIABILITY – MANUFACTURING DEFECT
V	IV	NEGLIGENCE – FAILURE TO WARN
Ø	V	NEGLIGENT PRODUCT DESIGN
Ø	VI	NEGLIGENT MANUFACTURING
Ø	VII	GENERAL NEGLIGENCE
Ø	VIII	NEGLIGENT MISREPRESENTATION
Ø	IX	BREACH OF EXPRESS WARRANTIES
Ø	X	BREACH OF IMPLIED WARRANTIES
Ø	XI	VIOLATION OF CONSUMER PROTECTION AND DECEPTIVE TRADE PRACTICES LAWS and specify the state's statute below: Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§201-1, et seq.

Check if Applicable	COUNT	Cause of Action
	XII	UNJUST ENRICHMENT
$\overline{\checkmark}$	XIII	LOSS OF CONSORTIUM
	XIV	SURVIVAL ACTION
	XV	WRONGFUL DEATH
	XVI	OTHER:
	XVII	OTHER:
I 	f Count XV	VI or Count XVII is alleged, additional facts supporting the claim(s):
Œ		

V. JURY DEMAND

12. Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) has/have been damaged as a result of Defendants' actions or inactions and demand(s) judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Master Personal Injury Complaint.

Check if Applicable	COUNT	Cause of Action
	XII	UNJUST ENRICHMENT
Ø	XIII	LOSS OF CONSORTIUM
	XIV	SURVIVAL ACTION
	XV	WRONGFUL DEATH
	XVI	OTHER:
	XVII	OTHER:
I	f Count XV	I or Count XVII is alleged, additional facts supporting the claim(s);
=		

V. JURY DEMAND

12. Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) has/have been damaged as a result of Defendants' actions or inactions and demand(s) judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Master Personal Injury Complaint.